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RANDALL C. BUDGE rcb@racinelaw.net

2015 FEB -9 AM 9: 21

February 6, 2015

Jean D. Jewell, Secretary Idaho Public Utilities Commission PO Box 83720 Boise, Idaho 83720-0074

Re: IPUC Case No. PAC-E-15-01

Dear Ms. Jewell:

Enclosed you will find the original and seven (7) copies of *Petition of Monsanto Company for Leave to Intervene*. Please file the same with the Commission's records and return a file-stamped PDF copy to me. If you have any questions, please don't hesitate to call.

Thank you.

Sincerely,

randa⁄ll ø. Budgʻi

RCB:ts

cc: Service List

Randall C. Budge, ISB No. 1949 Thomas J. Budge, ISB No. 7465 RACINE, OLSON, NYE, BUDGE &

BAILEY, CHARTERED

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Attorneys for Intervenor Monsanto Company

2015 FEB -9 AM 9: 24

IDAHO PUBLIC
UTILITIES COMMISSION

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION)	
OF ROCKY MOUNTAIN POWER FOR)	Case No. PAC-E-15-01
AUTHORITY TO INCREASE RATES BY)	
\$10.7 MILLION TO RECOVER)	PETITION FOR MONSANTO
DEFERRED NET POWER COSTS)	COMPANY FOR LEAVE
THROUGH THE ENERGY COST)	TO INTERVENE
ADJUSTMENT MECHANISM)	
)	

PETITION OF MONSANTO COMPANY FOR LEAVE TO INTERVENE

COMES NOW Monsanto Company, herein called "this Intervenor" and pursuant to Rule 72 of the rules of Procedure of the Idaho Public Utility Commission, and by this Petition asks leave to intervene herein and to appear and participate as a party herein, and as basis therefor states as follows:

(1) The name and address of this Intervenor is:

Monsanto Company c/o Steven D. Spinner, Manager, Energy Procurement 800 N. Lindburg Blvd., Mailzone C2NF St. Louis, Missouri 63167

This Intervenor will be represented by:

Randall C. Budge Thomas J. Budge

Racine, Olson, Nye, Budge & Bailey, Chartered

PETITION OF MONSANTO COMPANY FOR LEAVE TO INTERVENE - 1

P.O. Box 1391; 201 E. Center Pocatello, Idaho 83204-1391

and requests that copies of all pleadings and production requests and responses should be provided to the following:

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Brubaker & Associates 16690 Swingley Ridge Rd., #140 Chesterfield, MO 63017 E-Mail: bcollins@consultbai.com

James R. Smith Monsanto Company P.O. Box 816 Soda Springs, Idaho 83276

Fax: 208-547-3312

E-Mail: jim.r.smith@monsanto.com

- (2) This Intervenor has a direct and substantial interest in this proceeding as a special contract customer of Applicant Rocky Mountain Power and intends to participate in all respects herein as a party as may be required to represent its interests.
- (3) Without the opportunity to intervene herein, this Intervenor would be without a manner or means of participating in the lawful determination of issues which will result in affecting its rates for electric service.

WHEREFORE, this Intervenor requests that this Commission confirm this Intervenor's leave to intervene in these proceedings and to appear and participate in all matters as may be necessary and appropriate; and to present evidence, call and examine witnesses, cross-examine witnesses, present argument, and to otherwise fully participate in the proceedings.

DATED this 6 day of February, 2015.

RACINE, OLSON, NYE, BUDGE & BAILEY, CHARTERED

By:

RANDALL C. BUDGE

CERTIFICATE OF MAILING

I HEREBY CERTIFY that on this 6 day of February, 2015, I served a true, correct and complete copy of the foregoing document, to each of the following, via the method so indicated:

Jean D. Jewell, Secretary (original and 7) Idaho Public Utilities Commission P.O. Box 83720 Boise, ID 83720-0074

E-mail: jean.jewell@puc.idaho.gov

U.S. Mail + Email

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